

**INFORMATION TECHNOLOGY:
Treasury Web Sites Substantially Comply
With OMB Privacy Policies
And Data Collection Standards**

OIG-01-044

February 17, 2001



Office of Inspector General

The Department of the Treasury

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Abbreviations

| | |
|---------|--------------------------------------|
| BEP | The Bureau of Engraving and Printing |
| CIO | Chief Information Officer |
| Customs | The United States Customs Service |
| DO | Departmental Offices |
| FMS | Financial Management Service |

Contents

Abbreviations (Continued)

| | |
|-------------|--|
| Mint | The United States Mint |
| OCC | Office of the Comptroller of the Currency |
| OIG | Office of Inspector General |
| OMB | Office of Management and Budget |
| OMB M-00-13 | OMB Memorandum, <i>Privacy Policies and Data Collection on Federal Web Sites</i> (M-00-13) |
| Treasury | The Department of the Treasury |

*The Department of the Treasury
Office of Inspector General*

February 17, 2001

James J. Flyzik
Deputy Assistant Secretary for
Information Systems and Chief Information Officer
Department of the Treasury

The Office of Inspector General (OIG) is required by the Consolidated Appropriations Act of 2001 (P.L. 106-554) to submit to Congress by February 19, 2001, a report that discloses any activity "...relating to (1) the collection or review of singular data, or the creation of aggregate lists that include personally identifiable information, about individuals who access any Internet site of the department or agency; and (2) entering into agreements with third parties, including other government agencies, to collect, review, or obtain aggregate lists or singular data containing personally identifiable information relating to any individual's access or viewing habits for governmental and nongovernmental Internet sites."

We reviewed Department of the Treasury (Treasury) web sites to identify the use of cookies (a small text file placed on a user's computer). We also asked Treasury offices and bureaus to certify that they had not entered into third party agreements for sharing personally identifiable information. A more detailed description of our objective, scope and methodology is provided in Appendix 1.

Results in Brief

During our audit, we noted that Treasury offices and bureaus substantially complied with the standards set by the Office of Management and Budget (OMB). Treasury maintains at least 30 web sites, which include approximately 22,302 web pages. We reviewed a total of 130 web pages (see Appendix 2) and found that 6 of the web sites set persistent cookies (see Appendix 3 for examples) on some of their web pages. Further, to determine if Treasury had entered into agreements to share personally identifiable information with third parties, we requested that the Treasury office and bureau Chief Information Officers (CIO) provide a certification statement on this subject. We received certification statements from all Treasury offices and bureaus reviewed stating that they had not entered into agreements with third parties to share personally identifiable data (See Appendix 4). Our review also found that the administration of Treasury web sites needs improvement. Our research identified 19 Treasury web sites that were not reported by Treasury (see Appendix 2); 11 of the 30 Treasury web sites did not have privacy statements, and 2 Treasury bureaus were unaware that specific web sites had persistent cookies.

We are making three recommendations that, in our opinion, will assist Treasury in correcting these deficiencies. Foremost among these recommendations is that Treasury should comply with OMB standards and immediately (1) require that Treasury components justify the compelling need to use cookies on their web sites and also obtain the personal approval from the Secretary of the Treasury (or delegate) for their use, (2) remove unapproved persistent cookies from Treasury web pages, or shutdown affected Treasury web sites. During the process of requesting approval on existing sites, or while re-programming to remove the persistent cookies, the affected web sites should prominently place a banner on the home page specifically alerting all users of the current existence of the persistent cookies and the planned removal. Additionally, we are recommending that web site administration be improved through applying consistent Treasury web policy,

including site exit banners and privacy statements, and maintaining a full inventory of Treasury web sites and require that prior to the establishment of any new sites that the Treasury CIO be notified. We believe these last two recommendations will assist the CIO to exert authority over all Web activities in the Department and require adherence to established standards.

The Treasury CIO's response to our draft report concurred with our findings and recommendations. The response is evaluated and summarized in the body of this report and included in detail as Appendix 7.

Background

Pursuant to Section 646 of the Treasury and General Government Appropriations Act, 2001 (H.R. 5658), enacted on December 21, 2000, as part of the Consolidated Appropriations Act of 2001 (P.L. 106-554) requires that "...not later than 60 days after the date of enactment of this Act, the Inspector General of each department or agency shall submit to Congress a report that discloses any activity of the applicable department or agency relating to (1) the collection or review of singular data, or the creation of aggregate lists that include personally identifiable information, about individuals who access any Internet site of the department or agency; and (2) entering into agreements with third parties, including other government agencies, to collect, review, or obtain aggregate lists or singular data containing personally identifiable information relating to any individual's access or viewing habits for governmental and nongovernmental Internet sites."

Additionally, OMB previously set the standard in this area with their June 22, 2000 Memorandum, *Privacy Policies and Data Collection on Federal Web Sites* (M-00-13). This document requires that: "Under this new Federal policy, 'cookies'¹ should not be used at

¹ "A cookie is a short string of text—not a program—that is sent from a web server to a web browser when the browser accesses a web page. The use of cookies allows the server to recognize returning users, track on-line purchases, or maintain and serve customized web pages. Domain cookies are cookies placed by the visited web site. However, some

Federal web sites, or by contractors when operating web sites on behalf of agencies, unless, in addition to clear and conspicuous notice, the following conditions are met: a compelling need to gather the data on the site; appropriate and publicly disclosed privacy safeguards for handling of information derived from 'cookies'; and personal approval by the head of the agency." OMB limited this restriction later to "persistent" cookies.²

Therefore, the overall objective of this audit was to determine whether Treasury offices and bureaus were complying with OMB standards on the use of persistent cookies on their web sites and whether they had entered into agreements to share personally identifiable data with third parties.

Findings and Recommendations

In order to perform our audit of Treasury's activities as they relate to the gathering of personal information via the Internet, we asked the Treasury offices and bureaus to provide a listing of their web sites. Based upon their information and our research, we reviewed 30 Treasury web site home pages and 100 additional web pages from these sites. We reviewed these web sites for compliance with OMB standards on the use of persistent cookies. We also requested statements from Treasury components certifying that they had not entered into third party agreements to share personally identifiable information.

web sites also allow the placement of third-party cookies—cookies placed on a visitor's computer by a domain other than the site being visited. The domain and third-party cookies may be further grouped into session and persistent cookies. Session cookies are short-lived, are used only during the browsing session, and expire when the user quits the browser. Persistent cookies specify expiration dates, remain stored on the client's computer until the expiration date, and can be used to track users' browsing behavior by identifying their Internet addresses whenever they return to a site." General Accounting Office: *Federal Agency Use of Cookies* (GAO-01-147R)

² Letter from the Administrator, OMB's Office of Information and Regulatory Affairs, to Chief Information Officer, Department of Commerce, September 5, 2000.

Finding 1

Select Treasury Bureaus Set Persistent Cookies

Persistent cookies were found on web sites at the Bureau of Engraving and Printing (BEP), the United States Mint (Mint), the Office of the Comptroller of the Currency (OCC), the Departmental Offices (DO), and the United States Customs Service (Customs).

OMB M-00-13, dated June 22, 2000, specifically states that under Federal policy "cookies" should not be used at Federal web sites or by contractors when operating web sites on behalf of agencies, unless:

1. Clear and conspicuous notice is posted.
2. A compelling need to gather the data on the site.
3. Appropriated and publicly disclosed privacy safeguards for handling of information derived from "cookies".
4. Personal approval by the head of the agency.

We reviewed 30 home web sites and 100 web pages and found 6 occurrences in which persistent cookies were set at the home pages or on a high-traffic page. These are:

| <u>Site:</u> | <u>Owner:</u> |
|--|---------------|
| www.itips.gov | DO |
| www.bep.treas.gov/store/ | BEP |
| www.usmint.gov | Mint |
| www.cccaonline.org | Mint |
| www.itds.treas.gov | Customs |
| www.banknet.gov | OCC |

(See Appendix 2)

We notified the CIOs of the responsible Treasury office or bureau of the persistent cookies and requested that they provide documentation supporting the "compelling" need to gather the data on the site as well as the personal approval by the head of the agency. The responses are shown in Appendix 5. These Treasury

components did not have approval from the Secretary of the Treasury authorizing the use of persistent cookies as required by OMB. It should be noted that when Customs was notified of the persistent cookies, they immediately shut down the www.itds.treas.gov site until the cookies could be removed.

We also found that privacy statements were not included on 11 of the 30 web sites home pages reviewed. OMB's Memorandum, *Privacy Policies on Federal Web Sites* (M-99-18), dated June 2, 1999, states that every Federal web site must include a privacy policy statement, even if the site does not collect any information that results in creating a Privacy Act record. Therefore, Treasury offices and bureaus are required to post clear privacy policies on World Wide Web sites, and the Treasury CIO should have provided guidance to Treasury components for doing so. The OMB guidance also stated that privacy statements must be posted to an agency's principal web site(s) by September 1, 1999. The OMB guidance further required postings of privacy statements on major entry points to web sites as well as at any web page, which collected substantial personal information from the public, by December 1, 1999. The privacy policy must clearly and concisely inform visitors to the site what information the agency collects about individuals, why the agency collects it, and how the agency will use it. An example of a privacy statement which clearly and concisely informs visitors can be found in Appendix 6.

We also carefully reviewed the web sites on which we received the persistent cookies to ensure that a privacy statement was attached and that it included a cookie clause and language on how the information would be used. We found that the BEP web page, www.bep.treas.gov/store, did not have a privacy statement. While this particular web page is not a home web site it is a high-traffic web page from which large amounts of personal information from the public is captured.

We also performed an extensive review of the 19 home web sites having privacy statements to ensure that OMB requirements of a cookie clause and the usage language were followed. We found

five instances in which the privacy statement did not meet the required guidelines of mentioning cookies.

Recommendation

To ensure the proper use of cookies, the Treasury CIO should immediately:

- Require that Treasury components justify the compelling need to use cookies on their web sites and also obtain personal approval from the Secretary of the Treasury (or his delegate) for their use, and,

Management Response:

The CIO believes the bureaus currently using persistent cookies are doing so for valid and compelling business reasons. The CIO will work with all parties to obtain the requisite approvals from the Secretary or his designee within 60 days.

- Remove unapproved persistent cookies from Treasury web pages, or shutdown affected Treasury web sites, or while re-programming to remove the persistent cookies, the affected web sites should prominently place a banner on the home page specifically alerting all users of the current existence of the persistent cookies and the planned removal.

Management Response:

While seeking approval from the Secretary of the Treasury, the Bureaus will post conspicuous warnings on their web sites that persistent cookies are being used and that approval is being sought.

OIG Comment:

We concur with management's planned actions and consider the issue resolved pending completion of the stated remedies.

Finding 2

Administration Of Treasury Web Sites Needs Improvement

Treasury offices and bureaus were asked to provide a listing of Treasury web sites and the underlying web pages. Treasury offices and bureaus responded to our initial data call with an inventory of nine Treasury web sites. While we were provided the main Treasury office or bureau web page, web pages for specific projects were not always included (see Appendix 2).

Our research identified an additional 21 Treasury web sites. We reviewed 30 Treasury web sites and found that 11 of the 30 Treasury web sites did not have privacy statements. Further, two Treasury bureaus were unaware that specific web sites under their web administration used persistent cookies. In addition, none of the six sites with persistent cookies had their use authorized by the head of the agency (i.e., the Secretary of the Treasury).

Further, some Treasury offices and bureaus did not know specific information about their web sites. For example, when Treasury's Office of the CIO was contacted about the www.gits-sec.treas.gov web site, they were not aware of who was responsible for that site. The Mint's response stated that www.usmint.gov set only session cookies, not the persistent cookies that we found. Customs response stated that they had overlooked www.itds.gov in their review of sites and immediately shut down the site until the persistent cookies could be removed.

While not an OMB requirement, we noted that the Community Development Financial Institution, the Financial Management Service (FMS) and OCC took steps to warn users when leaving their web pages to other web sites where privacy policies and cookie usage may differ. This is important as the privacy statement identified on each of these sites only applies to the Treasury site. For example, when we selected a news article on Customs home web page, we were immediately transferred to a commercial site which set a persistent cookie.

As stated in Finding 1, OMB M-00-13 set the standards for the use of persistent cookies and privacy statements. While the use of an exit warning banner is not required, GAO specifically mentioned their use by stating that "During our work, we noted that the privacy policies of some agencies clearly alerted visitors when they were leaving the agencies' Web site, or the visitors received a message when they were leaving the agency's Web site."³

Treasury has not issued formal policy guidance to implement OMB's standards for persistent cookies and privacy policies. Treasury also has not provided formal guidance on web site management issues, including the use of exit banners. Therefore, Treasury is at risk that a new Treasury web site may be created for a specific project that does not comply with Federal policy standards and collects personally identifiable information without proper warning or authorization.

Recommendations

The Treasury CIO should:

- Apply and enforce consistent Treasury web policy, including site exit banners and privacy statements.

Management Response:

The CIO's Office will formalize and enforce web policies that include site exit banners and privacy statements within 90 days.

- Maintain a full inventory of Treasury web sites and require that prior to the establishment of any new sites the Treasury CIO be notified.

³ GAO/GGD-00-191. *Internet Privacy: Agencies' Efforts to Implement OMB's Privacy Policy* (September 2000)

Management Response:

The CIO's Office will update and maintain a Treasury web site inventory within 30 days.

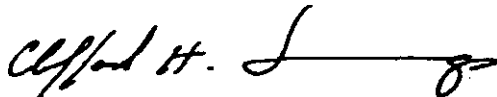
While seeking approval from the Secretary of the Treasury, the Bureaus will post conspicuous warnings on their sites that persistent cookies are being used and that approval is being sought.

OIG Comment:

We concur with management's planned actions and consider the issue resolved pending completion of the stated remedies.

* * * * *

We would like to extend our appreciation to the Treasury offices and bureaus for the cooperation and courtesies extended to our staff during our review. If you have any questions, please contact me at (202) 927-5771, or a member of your staff may contact Ed Coleman, Deputy Director, Information Technology Audits at (202) 927-5171. Major contributors of this report are listed in Appendix 8.



Clifford H. Jennings
Director, Information Technology Audits

For purposes of this audit, we reviewed home pages and web sites for the following Treasury offices and bureaus: the Bureau of Alcohol, Tobacco and Firearms, the Bureau of Engraving and Printing, the Bureau of the Public Debt, the United States Customs Service, the Departmental Offices, the Federal Law Enforcement Training Center, the Financial Management Service, the United States Mint, the Office of the Comptroller of the Currency, the Office of Thrift Supervision, and the United States Secret Service.

The overall objective of this audit was to determine whether Treasury offices and bureaus are complying with OMB standards on the collection of personally identifiable information. The audit was limited to Treasury web sites, the use of persistent cookies, and third party agreements for sharing personally identifiable information. Our audit did not review data collection in regards to authorized law enforcement investigations. We also did not review web administration and security software tools that are used for web site planning, maintenance, system performance, and security purposes.

The use of persistent cookies by Treasury web sites requires that:

- The site gives clear and conspicuous notice.
- There is a compelling need.
- The cookies be approved by the head of the agency.
- That a privacy statement be provided.

Preliminary information was gathered through a Treasury-wide data request and supplemented with research using public search engines (i.e., Yahoo and GoTo). The resulting universe of Treasury web pages excluded Internal Revenue Service web pages. Work was conducted primarily within the offices of the OIG but also at an offsite non-governmental location using a commercial Internet service.

We also reviewed the privacy statements at each of the Treasury web sites and determined if there was notification (e.g., an exit warning banner) before leaving the Treasury web site.

Additionally, we determined whether Treasury offices or bureaus had entered into agreements with third parties to collect and share personally identifiable information. This was performed by obtaining a certification statement from each Treasury office or bureau CIO. Additionally, we also contacted the four CIOs responsible for the Treasury web pages with the persistent cookies and requested that they supply us with the documentation authorizing the use of the persistent cookies.

This report details the fieldwork performed at Treasury offices that concluded in February 2001. We conducted our audit in accordance with generally accepted government auditing standards.

Appendix 2
Treasury Web Sites

| Bureau/Office | Home Web Pages | Web Site Provided From Data Call | No. of Web Pages Provided by Bureaus | Total Web Pages Reviewed | Persistent Web Page Cookies | Privacy Statement Exist |
|---------------|----------------------------|----------------------------------|--------------------------------------|--------------------------|-----------------------------|-------------------------|
| DO | www.ustreas.gov | Yes | 3,021 | 9 | No | Yes |
| | www.fba.gov | No | 21 | 5 | No | No |
| | www.fcn.gov | No | 31 | 5 | No | No |
| | www.fedsources.gov | No | 9 | 5 | No | No |
| | GITS-SEC.treas.gov | No | | 5 | No | Yes |
| | www.itips.gov | No | 44 | 5 | Yes | Yes |
| | OSDBU.treas.gov | No | | 3 | No | No |
| ATF | www.atf.treas.gov | Yes | 3,648 | 5 | No | Yes |
| | ows.atf.treas.gov:8877 | No | 9 | 1 | No | No |
| | ows.atf.treas.gov:9999 | No | | 1 | No | No |
| BEP | bep.treas.gov | Yes | 399 | 4 | No | Yes |
| | bep.treas.gov/store/index. | Yes | | 1 | Yes | No |
| BPD | www.publicdebt.treas.gov | Yes | 1,144 | 5 | No | Yes |
| | arc.publicdebt.treas.gov | No | | 5 | No | Yes |
| | www.treasurydirect.gov | No | | 5 | No | Yes |
| Customs | www.customs.treas.gov | Yes | 6,954 | 5 | No | Yes |
| | www.cebb.customs.treas.gov | No | 7 | 5 | No | No |
| | www.itds.treas.gov | No | 1,125 | 5 | Yes | * Yes |
| FLETC | www.fletc.gov | Yes | 181 | 5 | No | Yes |
| FMS | www.fms.treas.gov | Yes | 2,322 | 5 | No | Yes |
| | www.emoney.gov | No | 17 | 5 | No | No |
| | www.iccc.gov | No | | 5 | No | Yes |
| | www.pay.gov | No | 4 | 5 | No | No |
| | secure.**.treas.gov | No | | 1 | No | No |
| Mint | www.usmint.gov | Yes | 140 | 5 | Yes | Yes |
| | cccaonline.org | No | | 1 | Yes | Yes |
| OCC | www.occ.treas.gov | Yes | 1,995 | 5 | No | Yes |
| | www.banknet.gov | Yes | 1,176 | 1 | Yes | Yes |
| OTS | www.ots.treas.gov | Yes | 32 | 5 | No | Yes |
| | www.fcqg.gov | No | 23 | 5 | No | Yes |
| USSS | badcheck.treas.gov | No | | 3 | No | No |
| *** Total | | | <u>22,302</u> | <u>130</u> | | |

*Yes: Privacy Statement exists only if browser is set to accept cookies.

** Secure web site set up on the FMS commercial server (ICCC).


***The web pages provided are an approximation as we do not have totals on certain sites discovered after the bureaus submitted their listings.

Appendix 3
Examples of Cookies on Treasury Web Sites

| | |
|---|----|
| 1. Mint Persistent Cookie | 17 |
| 2. BEP Persistent Cookie | 18 |
| 3. FirstGov Session Cookie | 19 |
| 4. Text of Cookie File Placed on Hard Drive By www.bep.treas.gov/store | 20 |

1. Mint Persistent Cookie

Security Alert

 In order to provide a more personalized browsing experience, will you allow this Web site to put information on your computer?

If you click Yes, the Web site will save a file on your computer. If you click No, the current Web page may not display correctly.

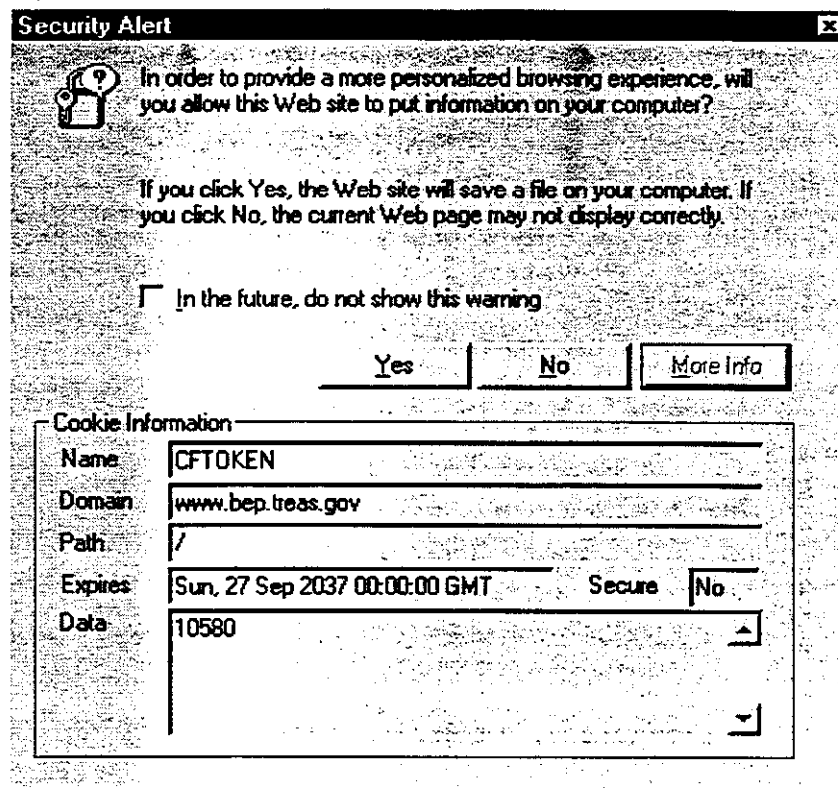
☐ In the future, do not show this warning

[Yes](#) [No](#) [More Info](#)

Cookie Information


| | | | |
|---------|-------------------------------|--------|-----------------------------|
| Name | CFTOKEN | | |
| Domain | www.usmint.gov | | |
| Path | / | | |
| Expires | Tue, 13 Feb 2001 17:07:14 GMT | Secure | <input type="checkbox"/> No |
| Data | 41439947 | | |

2. BEP Persistent Cookie



3. FirstGov Session Cookie

Security Alert [X]

 In order to provide a more personalized browsing experience, will you allow this Web site to put information on your computer?

If you click Yes, the Web site will save a file on your computer. If you click No, the current Web page may not display correctly.

☐ In the future, do not show this warning

Cookie Information

| | | | |
|---------|------------------|--------|-----------------------------|
| Name | sessionid | | |
| Domain | firstgov.gov | | |
| Path | / | | |
| Expires | End of session | Secure | <input type="checkbox"/> No |
| Data | 982091662587_172 | | |

4. Text of Cookie File Placed on Hard Drive By www.bep.treas.gov/store:

CFTOKEN

10580

www.bep.treas.gov/

0

3546759168

32088942

1710786688

29398697

•

CFID

312113

www.bep.treas.gov/

0

3546759168

32088942

2053986688

29398697

*

Appendix 4
Certification Statements on Third Party Agreements

| Treasury Office/Bureau | Page |
|--|-------------|
| 1. Bureau of Alcohol, Tobacco and Firearms..... | 22 |
| 2. Bureau of Engraving and Printing..... | 23 |
| 3. Bureau of the Public Debt..... | 24 |
| 4. Departmental Offices | 25 |
| 5. Federal Law Enforcement Training Center..... | 26 |
| 6. Financial Crimes Enforcement Network | 27 |
| 7. Financial Management Service | 28 |
| 8. Office of the Comptroller of the Currency..... | 29 |
| 9. Office of Thrift Supervision..... | 30 |
| 10. Treasury Inspector General for Tax Administration..... | 31 |
| 11. United States Customs Service | 32 |
| 12. United States Mint | 33 |
| 13. United States Secret Service | 34 |

Appendix 4
Third Party Agreement Certification Statements

Feb-08-01 04:42pm From:ATF

202 927 8863

T-235 P.002/002 F-724



DEPARTMENT OF THE TREASURY
BUREAU OF ALCOHOL, TOBACCO AND FIREARMS
WASHINGTON, DC 20226

FEB - 8 2001

MEMORANDUM TO: Dennis S. Schindel
Assistant Inspector General for
Audit

FROM: Assistant Director
(Office of Science and
Technology)/CIO

SUBJECT: Certification Regarding Personally
Identifiable Information Relating
to Individuals' Access to Internet
Sites

Pursuant to Section 646 of the Treasury and General Government Appropriations Act, 2001 (H.R. 5658), enacted as part of the Consolidated Appropriations Act, 2001, Public Law 106-554, I hereby certify, in my capacity as Chief Information Officer (CIO), that the Bureau of Alcohol, Tobacco and Firearms has not entered into an agreement with any third parties, including other government agencies, to collect, review or obtain aggregate lists or singular data containing personally identifiable information relating to any individual's access or viewing habits with respect to any Internet site.

If you have any questions regarding this matter please feel free to contact me at (202) 927-8390.

Patrick R. Schambach
Patrick R. Schambach

WWW.ATF.TREAS.GOV

Appendix 4
Third Party Agreement Certification Statements

Feb 06 01 05:06p

Ron Falter

(202)874-3001

p.2



DEPARTMENT OF THE TREASURY
BUREAU OF ENGRAVING AND PRINTING
WASHINGTON, D.C. 20228

February 6, 2001

MEMORANDUM FOR DENNIS S. SCHINDEL
ASSISTANT INSPECTOR GENERAL FOR AUDIT

FROM: Ronald W. Falter, Chief Information Officer
Office of Information Systems *Ronald W. Falter*

SUBJECT: Certification Regarding Personally Identifiable Information
Relating to Individuals' Access to Internet Sites

Pursuant to Section 646 of the Treasury and General Government Appropriations Act, 2001 (H.R. 5658), enacted as part of the Consolidated Appropriations Act, 2001, Public Law 106-554, I hereby certify, in my capacity as Chief Information Officer that:

1. The information attached constitutes a complete description of the Bureau of Engraving & Printing's collection or review of singular data and collection of aggregate lists including personally identifiable information relating to any individual's access or viewing habits with respect to any Internet site, and
2. Bureau of Engraving & Printing has not entered into an agreement with any third parties, including other government agencies to collect, review or obtain aggregate lists or singular data containing personally identifiable information relating to any individual's access or viewing habits with respect to the Internet site.

Attachment

Appendix 4
Third Party Agreement Certification Statements

MEMORANDUM FOR: DENNIS S. SCHINDEL
ASSISTANT INSPECTOR GENERAL FOR AUDIT

FROM: CYNTHIA Z. SPRINGER, CIO AND ASSISTANT
COMMISSIONER OFFICE OF INFORMATION TECHNOLOGY

SUBJECT: Certification Regarding Personally

Identifiable Information Relating to Individuals' Access to Internet Sites Pursuant to Section 646 of the Treasury and General Government Appropriations Act, 2001 (H.R. 5658), enacted as part of the Consolidated Appropriations Act, 2001, Public Law 106-554, I hereby certify, in my capacity as Chief Information Officer, that:

1. The information attached constitutes a complete description of Bureau of the Public Debt collection or review of singular data and collection of aggregate lists including personally identifiable information relating to any individual's access or viewing habits with respect to any Internet site, and
2. The Bureau of the Public Debt has not entered into an agreement with any third parties, including other government agencies, to collect, review or obtain aggregate lists or singular data containing personally identifiable information relating to any individual's access or viewing habits with respect to any Internet site.

Signed:

Digitally signed by Cynthia Z. Springer
cn=Cynthia Z. Springer, ou=Bureau of the Public Debt, oo=Department of the Treasury, o=U.S.
Government, c=US
Date: 2001.02.07 16:52:35 -0500
Reason: Document is certified
Location: Parkersburg

Appendix 4
Third Party Agreement Certification Statements



ASSISTANT SECRETARY

DEPARTMENT OF THE TREASURY
WASHINGTON, D.C.

FEB 9 2001

MEMORANDUM FOR DENNIS S. SCHINDEL
ASSISTANT INSPECTOR GENERAL FOR AUDIT

FROM: James J. Flyzik *J Flyzik*
Acting Assistant Secretary for Management
and Chief Information Officer

SUBJECT: Certification Regarding Personally Identifiable Information
Relating to Individuals' Access to Internet Sites

Pursuant to Section 646 of the Treasury and General Government Appropriation Act, 2001 (H.R. 5658), enacted as part of the Consolidated Appropriations Act, 2001, Public Law 106-554, I hereby certify, in my capacity as Chief Information Officer, that:

1. the information attached constitutes a complete description of the Department of the Treasury's collection or review of singular data and collection of aggregate lists including personally identifiable information relating to any individual's access or viewing habits with respect to any Internet site, and
2. the Department of the Treasury has not entered into an agreement with any third parties, including other government agencies, to collect, review or obtain aggregate lists or singular data containing personally identifiable information relating to any individual's access or viewing habits with respect to any Internet site.

Appendix 4
Third Party Agreement Certification Statements

FEB-07 01 14:37 FROM:FLETC OIM/IRM

912-267-3113

TO: 20252767

PAGE: 02



DEPARTMENT OF THE TREASURY
FEDERAL LAW ENFORCEMENT TRAINING CENTER
GLYNCO, GEORGIA 31524

MAN 3-8 (IRM)

February 6, 2001

MEMORANDUM TO: Dennis S. Schindel
Assistant Inspector General for Audit
Department of the Treasury

FROM: Sandy H. Peavy *Sandy Peavy*
Chief Information Officer
Federal Law Enforcement Training Center

SUBJECT: Certification Regarding Personally Identifiable Information
Relating to Individuals Access to Internet Sites

Pursuant to Section 646 of the Treasury and General Government Appropriations Act, 2001 (H.R. 5658), enacted as part of the Consolidated Appropriations Act, 2001, Public Law 106-554, I hereby certify, in my capacity as Chief Information Officer of the Federal Law Enforcement Training Center (FLETC), that:

1. the information attached constitutes a complete description of the FLETC's collection or review of singular data and collection of aggregate lists including personally identifiable information relating to any individual's access or viewing habits with respect to any Internet site, and
2. the FLETC has not entered into an agreement with any third parties, including other government agencies, to collect, review or obtain aggregate lists or singular data containing personally identifiable information relating to any individual's access or viewing habits with respect to any Internet site.

If you have any questions or require further information, please contact Bill Dooley at (912) 261-4524

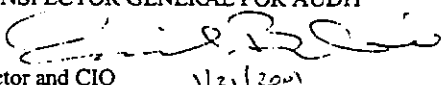
Appendix 4
Third Party Agreement Certification Statements



DEPARTMENT OF THE TREASURY
FINANCIAL CRIMES ENFORCEMENT NETWORK

JAN 31 2001

MEMORANDUM FOR DENNIS S. SCHINDEL
ASSISTANT INSPECTOR GENERAL FOR AUDIT

FROM: Emile Beshai 
Assistant Director and CIO 1/31/2001

SUBJECT: Certification Regarding Personally
Identifiable Information Relating to
Individuals' Access to Internet Sites

Pursuant to Section 646 of the Treasury and General Government Appropriations Act, 2001 (H.R. 5658), enacted as part of the Consolidated Appropriations Act, 2001, Public Law 106-554, I hereby certify, in my capacity as Chief Information Officer, that:

1. FinCEN's Internet site does not collect or review personally identifiable information relating to any individual, and
2. FinCEN has not entered into an agreement with any third parties, including other government agencies, to collect, review or obtain aggregate lists or singular data containing personally identifiable information relating to any individual's access or viewing habits with respect to any Internet site.

Appendix 4
Third Party Agreement Certification Statements



DEPARTMENT OF THE TREASURY
FINANCIAL MANAGEMENT SERVICE
HYATTSVILLE, MD 20782

February 14, 2001

MEMORANDUM FOR DENNIS S. SCHINDEL
ASSISTANT INSPECTOR GENERAL FOR AUDIT

FROM:

Constance E. Craig
Constance E. Craig
Chief Information Officer

SUBJECT:

Certification Regarding Personally
Identifiable Information Relating to
Individuals' Access to Internet Sites

Pursuant to Section 646 of the Treasury and General Government Appropriations Act, 2001 (H.R. 5658), enacted as part of the Consolidated Appropriations Act, 2001, Public Law 106-554, I hereby certify, in my capacity as Chief Information Officer, that:

1. The attached file and the CD hand delivered to your office this afternoon contain a complete list of webpage files managed by the Financial Management Service (FMS), with the exception of Pay.gov. The information on the Pay.gov web site will be hand delivered to your office on Friday, February 16, 2001. Four FMS web sites use session cookies - Payment Advice Internet Delivery (PAID), Treasury Report on Receivables (TROR), Judgement Fund and the Bank One/Anexsys web site for the Electronic Federal Tax Payment System (EFTPS). These session cookies do not gather data and are never written to the web user's hard drive - they are temporary cookies that reside only in the web user's computer memory. These cookies are maintained for the purpose of giving users a single, uninterrupted session when they are on-line. They are immediately deleted upon logging off of the site or after a period of inactivity. In addition, the Information Access System web site maintains user preference "cookies", but no personal information. More detailed information on these web sites is included in the attachment. Also, FMS does not utilize session or persistent "cookies" or any other device to capture personally identifiable information relating to any individual's access or viewing habits with respect to FMS's Internet site "www.fms.treas.gov".
2. The Financial Management Service has not entered into an agreement with any third party entity, including other government agencies, to collect, review or obtain aggregate lists or singular data containing personally identifiable information relating to any individual's access or viewing habits with respect to any FMS Internet site.

If you have any questions or need additional information, please call me on (202) 874-8000 or Wally Fung on (202) 874-8855.

Attachment



MEMORANDUM

Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

To: Dennis S. Schindel, Assistant Inspector General for Audit

From: Steven M. Yokai, Chief Information Officer

Date: February 15, 2001

Subject: Certification Regarding Personally Identifiable Information Relating to
Individuals' Access to Internet Sites

Pursuant to Section 646 of the Treasury and General Government Appropriations Act, 2001 (H.R. 5658), enacted as part of the Consolidated Appropriations Act, 2001, Public Law 106-554, I hereby certify, in my capacity as Chief Information Officer, that:

1. The information attached constitutes a complete description of the Office of the Comptroller of the Currency's (OCC) collection or review of singular data and collection of aggregate lists including personally identifiable information relating to any individual's access or viewing habits with respect to any Internet site, and
2. The OCC has not entered into an agreement with any third parties, including other government agencies, to collect, review, or obtain aggregate lists or singular data containing personally identifiable information relating to any individual's access or viewing habits with respect to any Internet site.

Please note that the OCC maintains both a public Internet site and a private Extranet site accessible to registered national banks. The public Internet site does not use "cookie" technology. The privacy policy found on the Extranet site discloses the OCC's use of "cookies."

Attachment

Appendix 4
Third Party Agreement Certification Statements



Office of Thrift Supervision
Department of the Treasury

1700 G Street, N.W., Washington, DC 20552 • (202) 906-5666 • Fax: (202) 906-6527

Timothy T. Ward, CIO
Director, Research and Information Systems

February 2, 2001

MEMORANDUM FOR: Dennis S. Schindel
Assistant Inspector General for Audit

FROM: Timothy T. Ward, Chief Information Officer
Director, Research and Information Systems

Timothy T. Ward

SUBJECT: Certification Regarding Personally
Identifiable Information Relating to
Individuals' Access to Internet Sites

Pursuant to Section 646 of the Treasury and General Government Appropriations Act, 2001 (H.R. 5658), enacted as part of the Consolidated Appropriations Act, 2001, Public Law 106-554, I hereby certify, in my capacity as Chief Information Officer, that:

1. The information attached constitutes a complete description of OTS's collection or review of singular data and collection of aggregate lists including personally identifiable information relating to any individual's access or viewing habits with respect to any Internet site, and
2. OTS has not entered into an agreement with any third parties, including other government agencies, to collect, review or obtain aggregate lists or singular data containing personally identifiable information relating to any individual's access or viewing habits with respect to any Internet site.

Attachment

Appendix 4
Third Party Agreement Certification Statements



INSPECTOR GENERAL
for TAX
ADMINISTRATION

DEPARTMENT OF THE TREASURY
WASHINGTON, D.C. 20220

February 15, 2001

MEMORANDUM FOR OFFICE OF TREASURY INSPECTOR GENERAL
Attn: ED COLEMAN

FROM: *Michael J. Murray*
for/Assistant Inspector General for Information Technology

SUBJECT: Compliance with OMB Directives Regarding Internet Web Pages

This memo is to provide written certification that TIGTA has not entered into agreements with third parties, including other government agencies, to collect, review, or obtain aggregate lists or singular data containing personally identifiable information relating to any individual's access or viewing habits for governmental and nongovernmental Internet sites.

Appendix 4
Third Party Agreement Certification Statements



U.S. Customs Service

Memorandum

DATE: FEB 07 2001

MEMORANDUM FOR DENNIS S. SCHINDEL
ASSISTANT INSPECTOR GENERAL FOR AUDIT

FROM: Assistant Commissioner *[Signature]*
Office of Information and Technology

SUBJECT: Personal Certification Regarding Access to Internet

Certification regarding personally identifiable information relating to individuals' access to Internet sites pursuant to Section 646 of the Treasury and General Government Appropriations Act, 2001 (H.R. 5658), enacted as part of the Consolidated Appropriations Act, 2001, Public Law 106-554, I hereby certify, in my capacity as Chief Information Officer, that:

1. The information attached constitutes a complete description of the U.S. Customs Service collection or review of singular data and collection of aggregate lists including personally identifiable information relating to any individual's access or viewing habits with respect to any Internet site, and
2. The U.S. Customs Service has not entered into an agreement with any third parties, including other government agencies, to collect, review or obtain aggregate lists or singular data containing personally identifiable information relating to any individual's access or viewing habits with respect to any Internet site. Attached is a full disclosure of the limited applications that do retrieve personal information on a voluntary and fully disclosed basis.

Any questions regarding this matter should be addressed to Earl Walter at (703) 921-6050 or Jeff Smith at (703) 921-7251.

Attachments

TRADITION

★

SERVICE

★

HONOR

Appendix 4
Third Party Agreement Certification Statements

February 13, 2001

MEMORANDUM FOR: Jackie Fletcher
Chief Information Officer

FROM: Jay Johnson
Director

SUBJECT: Use of Persistence Cookies on the U.S. Mint Web site

REFERENCE: OMB memorandum, 6/22/00,
Privacy Policies and Data Collection on
Federal Web Sites

In accordance with the above referenced Office of Management and Budget Memorandum, M-00-13, I approve the following:

1. Protecting Personal Privacy. The U.S. Mint is very concerned with protecting personal privacy. Personally identifiable information will not be collected, maintained, or stored unless provided voluntarily.

The U.S. Mint will use an "opt-in" strategy for collecting personal information. The identity of the visitor will be known only when an individual makes a decision to "register" or provide personal information (make a purchase, subscribe to our newsletter, send an email). All other visitors have no identity.

2. Third party agreements. The U.S. Mint will not rent or sell personally identifiable information for commercial purposes.
3. COPPA. The U.S. Mint does not attempt to collect personally identifiable information online from children under the age of 13.

Appendix 4
Third Party Agreement Certification Statements



DEPARTMENT OF THE TREASURY
UNITED STATES SECRET SERVICE

MEMORANDUM FOR DENNIS S. SCHINDEL
ASSISTANT INSPECTOR GENERAL
(FOR AUDIT)

FROM: STEPHEN T. COLO *Stephen T. Colo*
CHIEF INFORMATION OFFICER
(OFFICE OF PROTECTIVE RESEARCH)

SUBJECT: CERTIFICATION REGARDING PERSONALLY IDENTIFIABLE
INFORMATION RELATING TO INDIVIDUAL'S ACCESS TO
INTERNET SITES

Pursuant to Section 646 of the Treasury and General Government Appropriations Act, 2001 (H.R. 5658), enacted as part of the Consolidated Appropriations Act, 2001, Public Law 106-554, I hereby certify, in my capacity as Chief Information Officer of the Secret Service that:

1. The information attached constitutes a complete description of the U. S. Secret Service's collection or review of singular data and collection of aggregate lists including personally identifiable information relating to any individual's access or viewing habits with respect to any Internet site, and
2. The U. S. Secret Service has not entered into an agreement with any third parties, including other governmental agencies, to collect, review or obtain aggregate lists or singular data containing personally identifiable information relating to any individual's access or viewing habits with respect to any Internet site.

Cookies or session variables are not utilized on any of the U. S. Secret Service Internet Sites hosted by Treasury. Attached is a CD-ROM in HTML format that represents the entire collection of Secret Service Internet web pages.

Attachment

| | |
|---|-------------|
| Treasury Office/Bureau | Page |
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| Office of the Comptroller of the Currency | 39 |
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| United States Mint | 41 |

Appendix 5
Responses on Persistent Cookies

Feb 12 01 06:19p

Ron Falter

(202) 874-3001

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DIRECTOR

DEPARTMENT OF THE TREASURY
BUREAU OF ENGRAVING AND PRINTING
WASHINGTON, D.C. 20228

February 12, 2001

MEMORANDUM FOR DENNIS S. SCHINDEL
ASSISTANT INSPECTOR GENERAL FOR AUDIT

FROM:

Thomas C. Harris
for Thomas A. Ferguson

SUBJECT:

Use of Cookies on the Bureau of Engraving and Printing
(Bureau/BEP) Internet Site

OMB Memorandum 00-13, "Privacy Policies and Data Collection on Federal Web Sites," dated June 22, 2000, states that "cookies" should not be used at Federal web sites, or by contractors when operating web sites on behalf of agencies, unless, in addition to clear and conspicuous notice, the following conditions are met: a compelling need to gather the data on the site; appropriate and publicly disclosed privacy safeguards for handling of information derived from "cookies"; and personal approval by the head of the agency.

Although OMB's policy uses the general term "cookies," subsequent guidance clarifies that this policy applies only to tracking records, known as "persistent cookies," which are saved on a user's hard drive. This policy does not apply to other types of "cookies," such as "session cookies," which do not save data to a hard disk and are destroyed as soon as the web browser is closed.

The Bureau of Engraving and Printing (BEP) has a public web site, "Moneyfactory.com," that makes limited use of persistent cookies. BEP acquires technical services for web hosting and application development on this web site from a contractor, Bixler, Inc., through an interagency agreement with the Financial Management Service. Bixler, Inc. is a company with broad federal government web hosting experience. BEP is dependent on this contractor to provide a user friendly and secure interface to Moneyfactory.com where unique BEP products are offered for sale to the public.

Within the on-line store area of the web site only, cookies are dispensed to visitors as a means to track contents of each visitor's shopping cart. As the visitor adds items to the cart, the cookie is updated. The cookie contains a specially constructed token and ID that is used to track the user's movement through the store. The cookie is used to enhance the overall shopping experience. If, for example, a visitor elects to terminate a session and return later, the token and ID stored in the cookie will be read by the software to restore the content of the shopping cart for the visitor. The web software employed by Bixler does not write any customer specific information, such as name, address, contact information, credit card numbers, items purchased, or query the cookie for web sites visited prior to or after the BEP site.

Appendix 5
Responses on Persistent Cookies

Feb 12 01 06:19p

Ron Falter

(202) 874-3001

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Page 2

In summary, the web site uses a persistent cookie strictly for the most basic implementation of an online shopping cart and does not store any personally identifying data in the cookie. The goal of this cookie implementation is to enhance the shopping experience of visitors without infringing on their right to privacy. Because cookies are intrinsic to the provision of an efficient and convenient Internet shopping forum, there is a compelling need for using persistent cookies on the BEP web site. Failure to use cookies would make shopping on the BEP web site more cumbersome and complicated, and could be detrimental to BEP's sales activities. Accordingly, I authorize the limited use of cookies on the BEP web site for the specialized purpose described above.

In regard to the other requirements set forth in OMB Memorandum 00-13, I have instructed my staff to review and update the legal and privacy statement included on the BEP web site to ensure that it provides clear and conspicuous notice of the use of cookies and adequately discloses the privacy safeguards that apply to the handling of information derived from these cookies.

Appendix 5
Responses on Persistent Cookies



DEPARTMENT OF THE TREASURY
WASHINGTON, D.C. 20220

FEB 13 2001

MEMORANDUM FOR DENNIS S. SCHINDEL
ASSISTANT INSPECTOR GENERAL FOR AUDIT

FROM: *[Signature]* Jane L. Sullivan
Director, Office of Information Technology
Policy and Strategy

SUBJECT: Compelling Need to Utilize Persistent Cookies for the I-TIPS
System

The I-TIPS Resource Center (IRC), <http://www.itips.gov>, is an information sharing and program management Internet web site for the Information Technology Investment Portfolio System (I-TIPS), a government owned (Federal CIO Council) software application designed to strengthen and improve an organization's IT capital planning process.

To keep this sensitive information restricted to the SLA user community, the site requires the implementation of proper access control features. The use of "cookies" has been utilized as part of the IRC's access control features to handle this requirement. Specifically, the use of "cookies" enables segmentation of sensitive information visible to SLA members and their designated guests only. With cookies, SLA members can freely view privy information on the IRC not otherwise available to the public at large.

The I-TIPS staff is preparing a certification document detailing the compelling need for continuing the use of "persistent cookies." This document will be signed and forwarded to the OIG. In the interim a banner message will be displayed on the site indicating that certification of the site's use of persistent cookies is pending.

cc: David Borowski
Darren Ash
Joe Gude



MEMORANDUM

Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

To: Dennis S. Schindler, Assistant Inspector General for Audit

From: Steven M. Yokai, Chief Information Officer

Date: February 15, 2001

Subject: Certification Regarding Personally Identifiable Information Relating to
Individuals' Access to Internet Sites

Pursuant to Section 646 of the Treasury and General Government Appropriations Act, 2001 (H.R. 5658), enacted as part of the Consolidated Appropriations Act, 2001, Public Law 106-554, I hereby certify, in my capacity as Chief Information Officer, that:

1. The information attached constitutes a complete description of the Office of the Comptroller of the Currency's (OCC) collection or review of singular data and collection of aggregate lists including personally identifiable information relating to any individual's access or viewing habits with respect to any Internet site, and
2. The OCC has not entered into an agreement with any third parties, including other government agencies, to collect, review, or obtain aggregate lists or singular data containing personally identifiable information relating to any individual's access or viewing habits with respect to any Internet site.

Please note that the OCC maintains both a public Internet site and a private Extranet site accessible to registered national banks. The public Internet site does not use "cookie" technology. The privacy policy found on the Extranet site discloses the OCC's use of "cookies."

Attachment

Below is the text of the email response from Woody Hall, Assistant Commissioner/CIO of the United States Customs Service concerning www.itds.customs.treas:

"It is not the policy of U.S Customs to use persistent cookies. This site was developed under the direction of another organization prior to Customs assuming responsibility for its use and maintenance. Regrettably our review of Customs web sites for use of unauthorized cookies overlooked this site. Upon notification by you of the existence of persistent cookies on this site, we immediately removed it from service until the persistent cookies can be disabled. Thank you for your attention to this matter."

The United States Mint requested we use the following OMB memo dated September 5, 2000 as their response for the use of persistent cookies.

Appendix 5
Responses on Persistent Cookies



ADMINISTRATOR
OFFICE OF
INFORMATION AND
REGULATORY AFFAIRS

EXECUTIVE OFFICE OF THE PRESIDENT
OFFICE OF MANAGEMENT AND BUDGET
WASHINGTON, D.C. 20503

SEP - 5 2000

Roger Baker
Chief Information Officer
U.S. Department of Commerce
Room 5033
14th & Constitution Avenue, NW
Washington, DC 20230

Dear Roger:

Thank you for your letter of July 28, 2000, regarding OMB Memorandum 00-13 on "Privacy Policies and Data Collection on Federal Web Sites." We appreciate the CIO Council's strong support for protecting the personal information of citizens who visit federal web sites. We also stand ready to assist agencies as needed in implementing this guidance.

The President and the Vice President are strongly committed to the protection of privacy rights. They believe that the federal government should serve as a model of good privacy practices. Agencies need to be particularly careful before launching any effort to gather information on the activities of citizens who visit federal web sites. As we work to promote customer service, we must keep privacy concerns in mind.

In this spirit, OMB issued Memorandum 00-13, which aims specifically at the tracking of "the activities of users over time and across different web sites." As you correctly point out, a principal example of such is the use of persistent cookies. In accord with the Memorandum, federal web sites should not use persistent cookies unless four conditions are met:

- The site gives clear and conspicuous notice;
- There is a compelling need to gather the data on the site;
- Appropriate and publicly disclosed privacy safeguards exist for handling any information derived from the cookies; and
- The agency head gives personal approval for the use.

We are concerned about persistent cookies even if they do not themselves contain personally identifiable information. Such cookies can often be linked to a person after the fact, even where that was not the original intent of the web site operator. For instance, a person using

Appendix 5
Responses on Persistent Cookies


the computer later may give his or her name or e-mail address to the agency. It may then be technically easy for the agency to learn the complete history of the browsing previously done by users of that computer, raising privacy concerns even when the agency did not originally know the names of the users.

We recognize that agency web sites can also seek information from visitors in ways that do not raise privacy concerns. Specifically, they may retain the information only during the session or for the purpose of completing a particular online transaction, without any capacity to track users over time and across different web sites. When used only for a single session or transaction, such information can assist web users in their electronic interactions with government, without threatening their privacy. One example of such an approach that supports electronic government would be the use of a shopping cart to purchase a number of items online from the U.S. Mint. Another example would be the current technology that assists users in filling out applications that require accessing multiple web pages on the Department of Education's Direct Consolidation Loan site. We do not regard such activities as falling within the scope of Memorandum 00-13.

In your letter, you also inquired whether we should extend the policy guidance in Memorandum 00-13 to agency intranet sites as well as agency external internet web sites. The guidance, of course, focuses on internet traffic between the government and citizens. You raise an important issue, however, and we look forward to working with the CIO Council to review our policies regarding agency intranets.

Thank you again for sharing your insights and those of our CIO Council colleagues. Your creativity and support are indispensable to our electronic government efforts.

Sincerely,



John T. Spotila

Appendix 6

Example of Clear and Concise Privacy Policy

Privacy Policy

Page 1 of 2

PRIVACY POLICY

Privacy Policy

The OCC is committed to maintaining the privacy of your personal information. Our privacy policy explains the information we learn when you visit our site and how we will handle this information. The information we receive depends on what you do when you visit our site.

Information We Collect and Store Automatically When You Visit

If you browse through our web site, read pages or download information, we will gather and store certain information about your visit automatically. This information does not identify you personally. We collect and store the following information about your visit:

- *The Internet domain from which you access the Internet* (for example, aol.com, if you are connecting from an America Online account, or princeton.edu, if you are connecting from Princeton University's domain);
- *The IP (Internet Protocol) address* from which you access our site. An IP address is a number automatically assigned to your computer whenever you are surfing the World Wide Web.
- *The type of browser and operating system* for example, Netscape or Internet Explorer) used to access our site;
- *The date and time you access our site;*
- *The pages you visit;*
- *The address of the web site you visited immediately prior to visiting our*
- *The action that you tried to perform or the item you requested from the server* (for example, download a document) *and whether or not you were successful; and If your browser accepts cookies, we may use a cookie to determine if you are a repeat or a new visitor. When we examine this data it is presented in an aggregate form.*
- *If you linked to the National BankNet web site from another web site, the address of the originating web site; and*
- *The action that you tried to perform or the item you requested from the server* (for example, download a document) and whether or not you were successful.

We use this information to help us make our site more useful to visitors. We learn what users like and need; what kind of technology they are using; how often they visit; and other valuable information that helps us offer our visitors the best site possible.

We do not disclose, give, sell, or transfer any personal information about our web site visitors, unless required for law enforcement or otherwise required by law.

About "Cookies"

A cookie is a small piece of information that a Web Site stores in the Web browser. The cookie reside in your computer memory, or it might be placed in a file on your computer hard drive so that it can be retrieved by the Web site later. Only the Web site that sets the cookie can read it.

This site does not collect personal information that could be used to identify you or your activities, unless you have knowingly submitted specific information by completing a form, nor does it use cookies to track visits. The cookies we use fall into two categories:

http://www.banknet.gov/_mem_bin/privacy.html

2/16/01

Appendix 6

Example of Clear and Concise Privacy Policy

Privacy Policy

Page 2 of 2

1. Cookies that reside only in the temporary memory of your computer and not on the hard drive. This type of cookie is called a session or temporary cookie because it will last only through a single session or visit. These cookies do not capture any personally identifying information. They only collect information about your browser session. They are used to enable us to move information between pages when you navigate our site and to ensure the security of your communications with the OCC. When you close your browser, these cookies and the information about your session are automatically deleted.
2. Cookies that reside on your computer's hard drive and that contain no personal information. We do not intend to use these cookies to collect any personal information about you.

If your Web browser is configured to refuse sessions cookies, the site will not work properly. If your web browser is configured to refuse only persistent cookies, the site will work properly. You can delete persistent cookies from your computer hard drive after each of your visits.

Information We Collect and Store When You Send an Electronic Message Or Use Our Web Forms

Registered users may contact us electronically by using our site's "Message Center," or by submitting electronic comments, inquiries or on-line forms. Before doing so, there are a few things that registered users should know. We collect personally identifying information only if specifically and knowingly provided by you. We may use the information you send us in various ways. When you send us personally identifying information (e.g., in an electronic mail message containing a question or comment), we use this information to respond to your request. Your personally identifying information may be made available to OCC employees, such as our examiners or attorneys, having a business reason to see it. A copy of your message or form may be retained in our supervisory file for your bank. In addition, we may share the information you send us with other government agencies involved in financial services regulation or law enforcement. In other limited circumstances, including requests from Congressional committees or pursuant to subpoenas or other legal process, we also may disclose the information you submit to us.

About Security

For site security purposes and to ensure that this service remains available to all users, we employ software programs to monitor network traffic to identify unauthorized attempts to upload or change information, or otherwise cause damage. Unauthorized attempts to upload or change information, or otherwise cause damage, on this server are strictly prohibited and may be punishable under federal law.

Appendix 7
Management Comments



ASSISTANT SECRETARY

DEPARTMENT OF THE TREASURY
WASHINGTON

FEB 16 2001

MEMORANDUM FOR CLIFFORD H. JENNINGS
DIRECTOR, INFORMATION TECHNOLOGY AUDITS

FROM: James J. Flyzik *J. Flyzik*
Acting Assistant Secretary for Management
and Chief Information Officer

SUBJECT: Response to the OIG's Draft Audit Report on the Collection of
Personally Identifiable Information

Thank you for the opportunity to comment on the draft "Audit Report on the Collection of Personally Identifiable Information." The draft report is a fair and accurate representation of the Department of the Treasury's current Internet situation.

Comments:

Finding 1 - Select Treasury Bureaus Set Persistent Cookies.

The Bureaus and the DO Office listed use persistent cookies for valid and compelling business reasons. We are working with all parties to get the appropriate approval from the Secretary or his designee. **Estimated Time Frame - 60 days.**

In the interim Bureaus will post a conspicuous warning on their site that persistent cookies are being used and that the Department of the Treasury sites require a certification to use "persistent" cookies and that the site staff is working to obtain that certification. **Estimated Time Frame - 7 Business days.**

Finding 2 - Administration of Treasury Web Sites Need Improvement.

The CIO's Office will formalize and enforce Treasury Web policies that include site exit banners and privacy statements. **Estimated Time Frame - 90 Days.**

The CIO's Office will update and maintain a Treasury web site inventory.
Estimated Time Frame - 30 days.

Appendix 7
Management Comments

1

The CIO's Office will establish policy that requires the Treasury CIO to be notified of the establishment of any new sites. **Estimated Time Frame - 90 days.**

Once again thank you for the opportunity to comment. If you have questions, please contact Jane Sullivan at 202-622-1599.

cc: Bureau Chief Information Officers

Office of Information Technology Audits

Clifford H. Jennings, Director, Office of IT Audits
Ed Coleman, Deputy Director, Office of IT Audits
Kevin Burke, IT Auditor
Beverly Dale, IT Auditor
Charles Intrabartolo, Computer Specialist
Melinda Smith, Referencer

Note: We also express our thanks to the Information Technology and Security Audit staff of the Office of Inspector General, Department of Transportation. They enabled us to save a significant amount of time in the conduct of this audit.

Treasury Departmental Offices

Office of the Deputy Assistant Secretary for Information
Systems/Chief Information Officer
Office of Accounting and Internal Control
Office of Budget

Office of Management and Budget

Office of Inspector General Budget Examiner